

November 22, 2025

Minister Rob Flack
Ministry of Municipal Affairs and Housing
777 Bay Street, 14th Floor
Toronto, ON M7A 2J3

Re: OPPI Feedback on ERO 025-1101: Consultation on Enhanced Development Standards – Lot Level (outside of buildings)

On behalf of the Ontario Professional Planners Institute (OPPI), we are pleased to provide input on the Ministry of Municipal Affairs and Housing (MMAH)'s request for comments on enhanced development standards at the lot level (outside of buildings).

OPPI is the recognized voice of Ontario's planning profession. With over 5,000 members, it serves as both the Professional Institute and regulator of Registered Professional Planners (RPP) in the province. Our members work across the planning spectrum, for consulting firms, developers, municipal governments and within the Ontario Public Service, other community agencies and academic institutions. They work across a geographically diverse cross-section of Ontario—in communities ranging in size from small to large.

In principle, OPPI supports initiatives aimed at enhancing development standards at the lot level. Establishing a consistent approach to green development will help mitigate inconsistencies in requirements and application, while reducing complexity for builders working across multiple jurisdictions. With this in mind, OPPI respectfully recommends the following:

1. That green development continues to be implemented, but in a coordinated and standardized manner across the province. A consistent provincial framework will promote clarity, fairness, and efficiency in the development process, ensuring that sustainability objectives are achieved without creating unnecessary administrative or procedural burdens. At the same time, the framework should allow flexibility to reflect regional and contextual differences, recognizing that enhanced development standards may vary based on topography or other geographic characteristics (e.g., urban areas, waterfronts, and other distinct landscapes).
2. That a basic list of features (e.g., bioswales, naturalized shorelines, permeable pavement, native tree requirements, soakaway pits, and more) be generated that reflect recognized design and industry best practices to enable municipalities who wish to implement them to do so in an expeditious, standardized manner.

This approach is both fiscally responsible for governments and aligned with the broader objective of enhancing community safety. It would allow builders to incorporate standardized green development features that help communities better adapt to adverse weather conditions, thereby improving overall public safety.

Thank you for the opportunity to provide feedback on the ERO 025-1101. We would be pleased to meet with you to discuss our recommendations, and their utility to the overarching objective to build faster while enhancing community safety. If you have any questions or would like to schedule a meeting, please do not hesitate to contact us at (416)-483-1873 x2313 or by email at s.wiggins@ontarioplanners.ca.

Sincerely,



Andria Leigh, MCIP, RPP, Dipl.M.M.
Chair, OPPI



Susan Wiggins, CAE, Hon. IDC
Executive Director, OPPI